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or by the council thereof, by whosoever such action is brought shall be and the same is hereby forever stayed." On the argument which afterwards took place the plaintiff contended that this legislation as well as 7 Edw. VII. c. 19 was ultra vires, and that the action was not thereby stayed. Held, that the legislation above referred to was within the powers of a provincial legislature; and that, as the legislature had said the action should be stayed, it was the duty of the judge to obey such order, and that no judgment could be entered, except that the record might be endorsed with a declaration that the action was stayed by the legislation referred to; and further that no order could be made as to costs.

Barring Foreign Corporations from Federal Courts.—Alabama enacted a law in 1907 providing that if any foreign corporation procured the removal of a cause from a state to a federal court its franchise would be canceled, and any contract in interstate business thereafter made by it would be void. At the time of the entrance of the state by the telegraph company it had a constitutional assurance that "all corporations shall have the right to sue in all courts in like cases as natural persons." In *Western Union Telegraph Co. v. Julian*, 169 Federal Reporter, 166, an injunction was sought to prevent the operation of the statute. The circuit court, granting the injunction, characterized the statute as an attempt to forfeit property or business because its owner exercised a constitutional right in a lawful way, in a resort to the courts of his country for justice, and as transcending all the bounds of the legislative power, being a mere edict of despotism. No court which sits to administer the fundamental law can recognize it as a legitimate exercise of power.

Removal of Churches by Vestry.—Since 1807 St. John's Chapel has been a place of worship in New York. Owing to changed conditions in its neighborhood, the vestry of Trinity Church determined to close it, and to transfer the work carried on there to another church within the same parish, half a mile distant. To prevent this removal an injunction was sought. In *Burke v. Rector, etc., of Trinity Church*, 117 New York Supplement, 255, the New York Supreme Court held that the vestry has the supervision and control, and is the sole manager of the temporalities of the corporation, and the plaintiffs are required to conform to the canons, usages, and discipline of the church of which they are members. The judicial power is reluctant to interfere in matters of religious or ecclesiastical arrangement, and will do so only when rights of property or civil rights are involved. No such rights appear to be affected by this controversy. No cause having been presented for the cognizance of a court of equity, the application for injunction was denied.